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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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JASON HALPERN,

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Plaintiff,

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vs.

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GARY THARALDSON,

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Defendant.

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Case No. 2:15-cv-02037-JCM-GWF

**MOTION FOR PERMISSION FOR  
WILLIAM R. FRIED, ESQ. TO  
APPEAR TELEPHONICALLY AT  
HEARING ON PLAINTIFF'S  
MOTION FOR EXTENSION OF  
DISCOVERY DEADLINE  
SCHEDULED FOR APRIL 18, 2016,  
AT 1:30 P.M. BEFORE U.S.  
MAGISTRATE JUDGE GEORGE W.  
FOLEY JR.**

**[PROPOSED ORDER GRANTING  
MOTION CONTAINED HEREIN]**

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Plaintiff, Jason Halpern, by and through his counsel, hereby moves for permission for

William R. Fried, Esq. to appear telephonically at hearing on Plaintiff's Motion for Extension of

Discovery Deadline, which is scheduled for April 18, 2016 at 1:30 p.m. before U.S. Magistrate

Judge George W. Foley, Jr.

This Motion is based on the following Memorandum of Points and Authorities, all pleadings and other papers already on file in this matter, and any oral argument the Court may entertain at any hearing on this matter.

4 DATED this 13th day of April, 2016.

# RICE REUTHER SULLIVAN & CARROLL, LLP

By: /s/ William R. Fried, Esq.

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1                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2                   Plaintiff Halpern, through his counsel, hereby requests that the Court grant Mr. William R.  
3 Fried, Esq. permission to appear telephonically at hearing on Plaintiff's Motion for Extension of  
4 Discovery Deadline (Dkt. # 40), which is scheduled for April 18, 2016 at 1:30 p.m. before U.S.  
5 Magistrate Judge George W. Foley, Jr. (Dkt. # 41).

6                   Mr. Fried is an attorney residing and practicing in New York, New York and he is  
7 admitted *Pro Hac Vice* in this case. Mr. Fried desires to participate in the April 18, 2016, hearing  
8 and respectfully requests to do so telephonically. Mr. Fried's local counsel will attend the hearing  
9 in person. Mr. Fried submits that (i) there is no prejudice to any party by allowing him to appear  
10 telephonically, (ii) this request is reasonable given the time and cost associated with appearing in  
11 person and where his local counsel will appear in person, and (iii) he believes he will be able to  
12 participate meaningfully and satisfactorily in the hearing process through a telephonic appearance.

13                  DATED this 13th day of April, 2016.

14                  **RICE REUTHER SULLIVAN & CARROLL, LLP**

15                  By: /s/ William R. Fried, Esq.

16                   David A. Carroll, Esq. (NSB #7643)  
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24                  Attorneys for Plaintiff Jason Halpern

1           **ORDER GRANTING MOTION FOR PERMISSION FOR WILLIAM R. FRIED, ESQ. TO**  
2           **APPEAR TELEPHONICALLY AT HEARING ON PLAINTIFF'S MOTION FOR**  
3           **EXTENSION OF DISCOVERY DEADLINE SCHEDULED FOR APRIL 18, 2016, AT 1:30**  
4           **P.M. BEFORE U.S. MAGISTRATE JUDGE GEORGE W. FOLEY JR.**

5           Upon consideration of the foregoing Motion and finding good cause appearing,

6           IT IS HEREBY ORDERED that Plaintiff's Motion is GRANTED and William R. Fried,  
7           Esq. may appear telephonically for the hearing on Plaintiff's Motion for Extension of Discovery  
8           Deadline, which is scheduled for April 18, 2016 at 1:30 p.m. before U.S. Magistrate Judge George  
9           W. Foley, Jr.

10           **IT IS SO ORDERED.**

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12           **UNITED STATES MAGISTRATE JUDGE**

13           **DATED:** April 14, 2016

## **CERTIFICATE OF SERVICE**

Pursuant to Fed.R.Civ.P. 5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of Rice Reuther Sullivan & Carroll, LLP, and that a true and correct copy of the **MOTION FOR PERMISSION FOR WILLIAM R. FRIED, ESQ.**  
**TO APPEAR TELEPHONICALLY AT HEARING ON PLAINTIFF'S MOTION FOR**  
**EXTENSION OF DISCOVERY DEADLINE SCHEDULED FOR APRIL 18, 2016, AT 1:30**  
**P.M. BEFORE U.S. MAGISTRATE JUDGE GEORGE W. FOLEY JR.** was served via electronic service, via CM/ECF, on this 13<sup>th</sup> day of April, 2016, to the addresses shown below:

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/s/ Gayle McCrea  
An Employee of Rice Reuther Sullivan & Carroll, LLP